

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK----- X
ANUCHA BROWNE SANDERS,

06 Civ. 0589 (GEL)

Plaintiff,

ECF CASE

- against -

MADISON SQUARE GARDEN, L.P., ISIAH
LORD THOMAS III and JAMES L. DOLAN,

Defendants.

DECLARATION OF KEVIN T. MINTZER IN
OPPOSITION TO MADISON SQUARE
GARDEN, L.P. AND JAMES L. DOLAN'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT AND MADISON SQUARE
GARDEN, L.P.'S MOTION FOR LEAVE TO
AMEND ITS ANSWER

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KEVIN T. MINTZER, under penalty of perjury, affirms and states as follows:

1. I am a member of the firm Vladeck, Waldman, Elias & Engelhard, P.C., attorneys for plaintiff Anucha Browne Sanders ("plaintiff" or "Browne Sanders") in this action against Madison Square Garden, L.P. ("MSG"), Isiah Lord Thomas III ("Thomas") and James L. Dolan ("Dolan"). I submit this declaration (a) in opposition to the motion by MSG and Dolan for partial summary judgment and (b) in opposition to the motion by MSG to amend its Answer to add a counterclaim.

2. As an accommodation to Leon Reimer ("Reimer"), Browne Sanders' accountant, the Vladeck firm advanced Reimer's initial retainer that he charged to Browne Sanders in November 2006. Browne Sanders reimbursed the firm in full for that payment.

3. Attached hereto as Exhibit 1 is a true and correct copy of a document produced by [REDACTED], entitled "Individual Tax Organizer (1040)."

4. Attached hereto as Exhibit 2 is a true and correct copy of a letter from plaintiff's counsel to MSG's counsel, dated January 20, 2006.

5. Attached hereto as Exhibit 3 is a true and correct copy of plaintiff's tax return for 2000.

6. Attached hereto as Exhibit 4 is a true and correct copy of plaintiff's tax return for 2005.

7. Attached hereto as Exhibit 5 is a true and correct copy of a New York Magazine article, dated March 21, 2005.

8. Attached hereto as Exhibit 6 is a true and correct copy of a letter from MSG's counsel to plaintiff's counsel, dated November 29, 2006.

9. Attached hereto as Exhibit 7 is a true and correct copy of the determination of the U.S. Equal Employment Commission, dated September 15, 2006.

10. Attached hereto as Exhibit 8 is a true and correct copy of the MSG Employee Code of Conduct produced by MSG.

11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the first day of plaintiff's deposition on November 27, 2006.

12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the second day of plaintiff's deposition on November 28, 2006.

13. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of the deposition of Dolan.

14. Attached hereto as Exhibit 12 is a true and correct copy of excerpts of the deposition of Joseph Favorito.

15. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the deposition of Roy Sanders.

16. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of the deposition of Ruth Browne.

17. Attached hereto as Exhibit 15 is a true and correct copy of excerpts of the deposition of Vicki Browne Moore.

18. Attached hereto as Exhibit 16 is a true and correct copy of excerpts of the deposition of Jeff Nix.

19. Attached hereto as Exhibit 17 is a true and correct copy of excerpts of the deposition of Melinda Gerrard.

20. Attached hereto as Exhibit 18 is a true and correct copy of excerpts of the deposition of Rick Singer.

21. Attached hereto as Exhibit 19 is a true and correct copy of [REDACTED] deposition.

22. Attached hereto as Exhibit 20 is a true and correct copy of Reimer's deposition.

23. Attached hereto as Exhibit 21 is a true and correct copy of Brock Weaver's deposition.

24. Attached hereto as Exhibit 22 is a true and correct copy of excerpts of the deposition of Barry Watkins.

25. Attached hereto as Exhibit 23 is a true and correct copy of excerpts of the deposition of Robert Levy.

26. Attached hereto as Exhibit 24 is a true and correct copy of excerpts of the deposition of Thomas.

27. Attached hereto as Exhibit 25 is a true and correct copy of the Declaration of Jonathan Schindel, Esq., dated January 23, 2007.

28. Attached hereto as Exhibit 26 is a true and correct copy of excerpts of the deposition of Hank Ratner.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 25, 2007 in New York, New York.



KEVIN T. MINTZER